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Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IRON TRIBE FITNESS, on behalf of itself
and all others similarly situated,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:25-cv-03281-CRB

**DECLARATION OF ANDREW YAPHE
IN SUPPORT OF DEFENDANT
META PLATFORMS, INC.'S
REPLY IN FURTHER SUPPORT OF
MOTION TO STAY DISCOVERY**

Courtroom: 6, 17th Floor
Before the Honorable Charles R. Breyer

1 I, Andrew Yaphe, hereby declare and state as follows:

2 1. I am a counsel at the law firm Davis Polk & Wardwell LLP, attorneys for Defendant
3 Meta Platforms, Inc. (“Meta”) in the above-captioned matter, and I am admitted to practice in this
4 Court. I submit this declaration in support of Meta’s Reply in Further Support of its Motion to
5 Stay Discovery. I have personal knowledge of the facts set forth below, and I could and would
6 competently testify to the following if called upon to do so.

7 2. On June 30, 2025, counsel for plaintiff sent counsel for Meta a draft joint case
8 management statement. In that draft, plaintiff proposed a case schedule under which the parties
9 would substantially complete document productions by October 17, 2025.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on the 23rd day of July, 2025 in Redwood City, California.

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13 /s/ Andrew Yaphe
14 Andrew Yaphe
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